Supreme Court, U.S.
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No. 91-1555

IN THE

Supreme Court of the United States

OCTOBER TERM, 1991

NATIONAL ADVERTISING COMPANY,

Petitioner,

v.

CITY OF RALEIGH,

Respondent.

BRIEF IN OPPOSITION TO THE PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

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QUESTION PRESENTED

Does the accrual date for statute of limitations purposes begin to run as soon as a newly adopted piece of legislation has some concrete effect on a property owner, and if so, what is the appropriate length of the limitation period?

PARTIES TO THE PROCEEDING

As noted in the petition, all parties are listed in the caption.

RULE 15.1 STATEMENT

Rule 15.1 of the Rules of the Supreme Court admonish Respondents to bring to the Court's attention any perceived misstatements of fact or law set forth in the petition which have a bearing on the question of what issues would properly be before the Court if certiorari were granted. In compliance with Rule 15.1, Respondent makes the following observations:

1. Petitioners' issues and argument are in large part based upon its contention that the ordinance in question had no effect on its business immediately upon passage in 1983. The fact is that the lower court did determine that actual and significant impacts did occur and, because of those impacts, made its decision. Petitioners' questions presented do not fairly represent the factual findings of the lower court.

2. Petitioner also contends that it was directed by the City to remove all its signs, including those located on Federal Aid Primary and Interstate highways. Such signs are protected by both state and federal law and are exempted from removal requirements by the clear language of the ordinance itself. (App. D)

RULE 29.1 STATEMENT

The Respondent, City of Raleigh, is a municipal corporation organized and operating under the laws

of North Carolina and has no other corporate affiliations or relations of any kind.

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STATEMENT

On October 18, 1983 the City of Raleigh enacted an Ordinance (No. 1983-210 TC 198) to control the proliferation of off-premise signs (billboards) in the City's zoning jurisdiction. (App. D)

In 1984, the ordinance was unsuccessfully challenged by Major Media of the Southeast, a large billboard operator. See *Major Media of the Southeast, Inc. d/b/a Naegele Outdoor Advertising Co. of Raleigh-Durham v. City of Raleigh*, 792 F. 2d 1269 (4th Cir., 1986) cert. denied, 479 U.S. 1002, 94 L. Ed 2d 185, 107 S. Ct. 1334 (1987). That action, filed some six months after the enactment of the ordinance, was a claim grounded, as is the case *sub judice*, in purported violations of the First and Fifth amendments to the United States Constitution.

The ordinance in question was effective on October 23, 1983. The ordinance does not prohibit billboards in Raleigh but does dramatically change the requirements for new billboards and, as of October 23, 1983, makes all then existing billboards nonconforming if they did not comply with any of the requirements for new signs. Those requirements concerned height (a thirty foot maximum), area (a 150 square foot maximum), and certain spacing or separation requirements generally requiring one billboard to be at least one thousand (1,000) feet from the next closest billboard. The ordinance also restricted the number of the City's zoning classifications into which billboards might be placed. Since October 23, 1983, all decisions relating to the permitting, locating, size, spacing, and zoning conformance status of billboards have been made according to the challenged ordinance. A non-

conforming billboard could not be replaced if destroyed.

ARGUMENT

A.

National's principal disagreement with the Court of Appeals and the District Court seems to be a belief that these bodies do not understand the law of ripeness, or that if they do understand it they have misapplied it. As an alternative argument, National contends that there is "hopeless confusion" nationally on this question and therefore, this Court must intervene. Such is simply not the situation. This court has clearly laid out the framework for evaluating the ripeness of land use issues.

As a beginning, this Court has been wise enough to realize that regulatory takings require an ad hoc analysis of the facts involved in the particular case. *Kaiser Aetna v. United States*, 444 U.S. 164, 62 L. Ed 2d 332 (1979). National's petition argues that "This case further muddies the waters by holding that damage occurs *upon enactment* of a land use regulation."

The case below makes no such holding and no such holding was sought at the trial or appellate level by Respondent. No fair reading of the Fourth Circuit or the District Court opinion could cause a reasonable reader to infer that such a sweeping rule was being made. The Court of Appeals did decide that in a situation where an ordinance had immediate and serious impact on a property owner, the property owner needed to come forward and assert his claim. Both the District Court and the Court of Appeals dealt

with an ad hoc analysis of the fact situation and determined thereby that this ordinance and fact situation were ripe for review on October 23, 1983. The Fourth Circuit noted that it was possible on that date to determine the identity and location of every sign to be affected by the ordinance. The ordinance on its face is self-executing and the provisions of the ordinance made the signs nonconforming on the date the ordinance became effective, *not* $5^1/_2$ years later. National contends that a valuation of the signs in 1983 would have been purely hypothetical, but how could it have been any less hypothetical than an analysis or appraisal done $5^1/_2$ years after ordinance passage when National claims that the life of a sign is at least 30 years? National further argues that the City's enactment of a general civil penalty for *all* zoning violations (not just billboard violations as indicated in the petition) somehow made it impossible to determine damages in 1983. This argument defies logic on two grounds. First,the penalties only apply to those who disregard the law. If National obeyed the law there would be no penalty. Second, a violation of any city ordinance, at the time of passage of the billboard ordinance and after, was already a criminal offense and carried a misdemeanor criminal penalty.

This case establishes no new ripeness rules. This case does apply the existing rules to an undisputed fact situation. Contrary to the petitioner's implication, this case has no specific application to zoning cases, wetland cases, subdivision cases, rent control cases, development permit cases, or any other land use cases. What it will relate to is other billboard, cases where the ordinance contains a self-executing, non-reviewable or non-variable amortization provision.

Again, contrary to National's implication, the nation's courts are not in a state of confusion regarding these cases and the ripeness question. This court and many others around the country have found these matters ripe for adjudication. *Metromedia, Inc. v. City of San Diego*, 453 U.S. 490, 101 S. Ct. 2882 (1981) (suit brought less than 3 months after the enactment of a 4 year amortization period); *Summey Outdoor Adv. v. County of Henderson*, 96 N.C. App. 533, 386 S.E. 2d 439 (1989) pet. for disc. rev. denied, 392 S.E. 2d 101 (1990) (suit brought within 9 months of enactment of a 5 year amortization period); *Naegele Outdoor Advertising Co. v. City of Durham*, 844 F. 2d 172 (4th Cir. 1988) (suit brought within 9 months of enactment of $5^1/_2$ year amortization period); *Georgia Outdoor Adv. Inc. v. City of Waynesville*, 833 F. 2d 43 (4th Cir. 1987) (suit brought within 5 months of enactment of a 4 year amortization period); and *Major Media of the Southeast, Inc. v. City of Raleigh*, *supra* (suit brought within 10 months of a $5^1/_2$ year amortization period.) The last case is noteworthy in that it was a challenge, albeit by another plaintiff, to exactly the same ordinance now being challenged by the petitioner. Evidently the *Major Media* plaintiff had no trouble realizing the ordinance's effects on it and immediately sought to protect itself. Ripeness may be raised by a court *sua sponte* whether or not the parties all wish a decision on the merits. *Federal Practice and Procedure 2d*, Wright, Miller, and Cooper §3532.1 Judicial Power Footnote 37; *Blanchette v. Connecticut Gen. Ins. Corp.*, 419 U.S. 102 (1974). National must face the fact that its signs became nonconforming on October 23, 1983, *not* $5^1/_2$ years later on April 24, 1989. The sand in the amortization hourglass began to run on October 23, 1983, *not* April 24, 1989. Na-

tional's status changed in 1983, *not* 1989. National knew upon passage of the ordinance the exact date by which its nonconforming signs must be removed. National also was prohibited from moving to another location in the city any of its signs which were too big or too tall and National was prohibited from replacing a nonconforming sign destroyed by a casualty. *National Advertising Co. v. Bradshaw*, 268 S.E. 2d 816 (1980).

B.

STATUTE OF LIMITATIONS FOR CONSTITUTIONAL CLAIMS

National also contends that, because the Court found the Fifth Amendment claim to be insulated by a statute of limitations, while finding that the First Amendment claim was not, an internal inconsistency exists in the opinion. No such inconsistency exists. The Circuit Court did not determine that the First Amendment claim was not subject to a statute of limitations. The opinion indicates that it may be "doubtful", but the Court does not decide the question because the claim was frivolous to start with inasmuch as this area of the law is well settled both at the national and state levels and did not require the court to reach that issue. National never had a realistic First Amendment claim and the Circuit Court's analysis in this case was done to point out that fact. A review of the record in this matter will reveal that the original complaint filed herein did not contain any allegations relating to a First Amendment violation. National's First Amendment claim was added later by way of an amended complaint even though the Circuit Court had already ruled on the

First Amendment validity of this and similar ordinances. Even had the Circuit Court actually held that the First Amendment claim could not be barred by a statute of limitations defense, such a ruling would not impugn the application of such a defense as it relates to the Fifth Amendment takings claim. It is well settled through state and federal inverse condemnation law that statutes of limitations most certainly do apply to "takings claims".

The City's motion for summary judgment on the First Amendment question was broached in the alternative. The District Court was asked to apply either a statute of limitation or to decide the case on the basis of *stare decisis*. Nothing prevented the Circuit Court from taking either approach and it chose the latter.

Even if the Circuit Court actually intended to hold that the statute of limitations was not applicable to First Amendment claims, it has not created a conflict or an inconsistency. Our jurisprudence historically notes a hierarchy of importance for the various amendments to the Constitution and the First Amendment has always enjoyed a high position in that hierarchy and has been differently treated for questions of standing and other purposes.

Some ordinances or practices, as pointed out in the petition, have been challenged long after enactment, but all such challenges are made either due to the operation of the "continuing wrong" doctrine (expressly ruled inapplicable in this case) or simply to the fact that a statute of limitations defense is an affirmative defense which is waived if not pleaded.

Finally, although it did not raise the matter at the district court or the appeals court level (except in a

rehearing petition), the petitioner now argues that because it arguably brought an action pursuant not only to 42 U.S.C. §1983 but also pursuant to the Fifth Amendment itself, it is entitled to some longer statute of limitations. Petitioner is not certain what that period is as evidenced by its casual adoption of the terms "adverse possession" and "inverse condemnation" as synonyms but is certain that, whatever its length, Petitioner feels that it must be long enough to encompass the dilatory period it waited before seeking redress for its supposed losses. Toward this end the petition looks to *Azul Pacifico, Inc. v. City of Los Angeles*, 948 F. 2d 575 (9th Cir. 1991) to justify its position.

Actually, *Azul Pacifico* is interesting because of the striking degree to which it is compatible with the opinion of the Circuit Court in this case. *Azul Pacifico* clearly makes a distinction between a physical, possessory, taking such as the one which occurred in that case and a regulatory type of taking case such as the one now before the Court. In this ordinance there is never a physical invasion, seizure, or occupation of any of a company's billboards. The owner reserves the right to relocate or salvage the structures. *Azul Pacifico* recognizes that the regulatory case required an ad hoc analysis just as the court applied in this case. *Azul Pacifico*, unlike Petitioner, correctly characterizes *Pennell v. City of San Jose*, 485 U.S. 1, 99 L. Ed 2d 1 (1988), as a ripeness case and not a standing case. *Azul Pacifico* also holds that the limitations period for takings claims begins to run the date the challenged ordinance is enacted. In fact, *Azul Pacifico* is in total harmony with the instant case except that the 9th Circuit also determined that

a separate non §1983 claim for taking had been made with the sole jurisdictional basis being the Constitutional itself. However, a review of the cases cited by the 9th Circuit fail to support that position. All of the cited cases are based upon some statute which grants jurisdiction for a Fifth Amendment claim and sets up the procedures for pursuing the claim. Also, all of the cited cases deal with actual physical invasions and occupation of private property just as *Azul Pacifico* does. *Kirby Forest Industries v. U.S.*, 467 U.S. 1, 81 L. 3d 2d 1 (1984) dealt with a condemnation of land to create Big Thicket National Park by the National Park Service pursuant to Title 40 U.S.C. §357, a statute dealing with Indian lands and how the same might or might note be condemned. *U.S. v. Causby*, 328 U.S. 256, 90 L. Ed 1206 (1945) dealt with condemnation of land by overflight at the Greensboro, N.C. airport and was decided on the basis of jurisdiction granted by 28 U.S.C. §250 relating to the Court of Claims. While it is true that the Constitution tells us how to compensate for a taking, it does not conceal a separate grant of jurisdiction or create a separate cause of action outside of some statutory scheme for enforcement. Remember again, *Azul Pacifico* dealt with a physical taking. No such physical taking has occurred in this case and the remedy for a regulatory taking is still at §1983 action.

Even assuming, *arguendo*, that such a distinct cause of action exists, it would still be barred by the statute of limitations. National has incorrectly represented to this Court and the Court of Appeals that the statute of limitations for inverse condemnation in North Carolina is 20 years. That period is quite erroneous. The statute of limitations for inverse condemnation in

North Carolina is 2 years. *Wilcox v. N.C. Highway Commission*, 181 S.E. 2d 435 (1971). Also, G.S.N.C. 40A-51. Obviously, National has also missed this limitation period. Even if it were decided that an additional federal cause of action does exist, it would still use a statute of limitations. Congress has not established any statute of limitations for claims under the Fifth Amendment made against local and state government. When congress has not established a time limitation for a federal cause of action, the settled practice has been to adopt a local time limitation as federal law if it is not inconsistent with federal law or policy to do so. *Wilson v. Garcia*, 471 U.S. 261, 85 L. Ed 2d 254 (1985). The absorption of state statutes of limitations within the interstices of the federal enactments is a phase of fashioning remedial details where Congress has not spoken, but left matters for judicial determination within the general framework of familiar legal principles. *Runyon v. McCrary*, 427 U.S. 160, 49 L. Ed 2d 415 (1976). Even the *Azul Pacifico* opinion noted that "state statutes have repeatedly supplied the periods of limitations for federal causes of action when federal legislation has been silent on the question". *Id.* at 13604 quoting *Auto Workers v. Hoosier Cardinal Corp.*, 383 U.S. 696, 16 L. Ed 2d 192 (1966).

The only justification for a federal statute is a reference to the possibility of thwarting uniform treatment of takings cases. This position fails to pass logical evaluation inasmuch as the same principle applies to §1983 litigation and yet, the courts have found a uniform class of period (personal injury) to be appropriate even though the actual length of the period varies from state to state. There is no justification

for using 28 U.S.C. §2401 since that is clearly a jurisdictional statute for actions against the United States.

The *Azul Pacifico* rationale is based entirely on the premise that the type of ordinance involved (rent control) constitutes a physical taking. However, on April 1, 1992 this Court decided *Yee v. City of Escondido, California*, No. 90-1947. *Yee* specifically overruled *Azul Pacifico* on the physical taking question and further held that the highest state court's contra position was the correct one. As much as *Azul Pacifico* supports its position, the respondent is convinced that it now provides questionable authority for either side in this petition proceeding.

SUMMARY

The rules of this Court (Rule 10.1) establish strict guidelines for the criteria which must be met before this Court will issue the writ of certiorari. These tests, and the reasons Petitioner fails them, are as follows:

a. **WHEN A UNITED STATES COURT OF APPEALS HAS RENDERED A DECISION IN CONFLICT WITH THE DECISION OF ANOTHER UNITED STATES COURT OF APPEALS ON THE SAME MATTER; OR HAS DECIDED A FEDERAL QUESTION IN A WAY IN CONFLICT WITH A STATE COURT OF LAST RESORT; OR HAS SO FAR DEPARTED FROM THE ACCEPTED AND USUAL COURSE OF JUDICIAL PROCEEDINGS, OR SANCTIONED SUCH A DEPARTURE BY A LOWER COURT, AS TO CALL FOR AN EXERCISE OF THIS COURT'S POWER OF SUPERVISION.**

Despite all its fulminations and tortured exercises in logic, Petitioner has failed to show that its case meets any of the tests in Rule 10.1(a). Petitioner can

show no conflict with any other circuit on this question. Neither can it show a conflict with the court of last resort in North Carolina or any other state. Indeed, as shown by the cases cited by the Respondent, every court, including this one, which has addressed this type of case has found that the matter was ripe for adjudication and has proceeded to deal with the matter. The principal holding of the only case cited by Petitioner has recently been overruled in its relevant parts by this Court. Nor is there anything in the record of this case to indicate that the action below was such a vast departure from the accepted and usual course of judicial proceedings so as to call for an exercise of this Court's supervisory powers. The court below has simply taken the rules set out by this court in *Williamson County Reg. Planning Comm. v. Hamilton Bank*, 473 U.S. 172 (1985) and other cases and applied those rules to a factual situation. In *Williamson* this Court has held that no takings issue is ripe if the government has provided an adequate process for obtaining compensation, the plaintiff has not sought or utilized the procedures for obtaining such compensation, and no administrative relief is available. The obverse of this holding would be that a matter is ripe when no adequate provision for obtaining compensation exists, and no process exists to obtain such compensation. In this case that is exactly what National has alleged. National has alleged that the ordinance denied just compensation and denies it a process to obtain compensation. Therefore, based on *Williamson*, National's causes of action were ripe for determination upon the effective date of this ordinance.

b. WHEN A STATE COURT OF LAST RESORT HAS DECIDED A FEDERAL QUESTION IN A WAY THAT CONFLICTS WITH THE DECISION OF ANOTHER STATE COURT OF LAST RESORT OR OF A UNITED STATES COURT OF APPEALS.

This test is not available to Petitioner since no state court of last resort decisions are in any way involved herein except for ones which are in accord with the resulting this case.

c. WHEN A STATE COURT OR A UNITED STATES COURT OF APPEALS HAS DECIDED AN IMPORTANT QUESTION OF FEDERAL LAW WHICH HAS NOT BEEN, BUT SHOULD BE, SETTLED BY THIS COURT, OR HAS DECIDED A FEDERAL QUESTION IN A WAY THAT CONFIICTS WITH APPLICABLE DECISIONS OF THIS COURT.

Petitioner also fails to meet the criteria of Rule 10.1(c). This Court has established the rules relating to ripeness by way of the cases cited in Petitioner's petition. What Petitioner disagrees with is the court of appeals findings of fact to which it applied those rules. Nevertheless, the courts below did determine that there was a final impact on Petitioner. The courts below had to make this finding before they could determine whether the limitations period should begin to run. This decision can only serve to clarify the law of ripeness, not to confuse it.

Apart from fairness and finality, there is another policy issue that should be considered. If landowners are allowed by this court to wait until the end of the amortization period to file litigation, it will inevitably extend the amortization period, and thereby disturb the legislative judgment about what length of time is a reasonable amortization period—a judgment which

is given great weight. *Texaco v. Short*, 454 U.S. 516, 70 L. Ed 2d 738, 102 S. Ct. 781 (1982); *State v. Joyner*, 286 N.C. 366, 211 S.E. 2d 320 appeal dismissed 422 U.S. 1002, 95 S. Ct. 2618, 45 L. Ed 2d 666 (1975). Extension of the amortization period will occur in one of two ways. Either landowners will obtain a preliminary restraining order during the pendency of the litigation or local governments when confronted with litigation, will not force abatement of the nonconformities until the litigation is ended. A prudent government, especially in these financially troubled times, will not force removal but instead will await the outcome of the litigation and then either enforce removal or amend the ordinance. The events in this case confirm the validity of these statements. The City of Raleigh has refused to demand that Petitioner remove its nonconforming billboards, because of the uncertainty created by this suit. The outcome shows that full implementation of the duly adopted sign policy of the City has been delayed. Petitioner billboard company for over the last three years has successfully defied the public will.

Judge Ellis writing for the Court of Appeals observed that permitting the billboard company to challenge the 1983 ordinance's amortization scheme more than $5^1/_2$ years after its adoption, would enable the company to retain its signs well beyond expiration of the amortization period and would be *unfair to the City.*

CONCLUSION

The United States Supreme Court should not exercise its discretion to hear this case. The Court

should refuse to exercise its discretion on the following grounds:

1. This case does not confuse the law concerning "ripeness". This case merely applied existing principles and rules established by this Court to a real life fact situation. Petitioner fails to recognize that it is just as wrong to bring an action too late as it is to bring it too soon. Petitioner suffered immediate, substantial damage and should have sought to protect itself just as numerous other plaintiffs around the country have done, including one who challenged the very ordinance now subject to assault by Petitioner.

2. This case does not require that a suit be filed before a cause of action exists. The cause of action arose when the enacted ordinance immediately changed the status and future capabilities of Petitioner's signs. Petitioner delayed litigation only for the purpose of effectively extending the amortization period.

3. This case is very narrow in its holding and will not cause, encourage, or compel a vast increase in the number of routine zoning and land use cases which are ripe for immediate litigation.

4. The lower court properly decided the length of the appropriate statute of limitations and there is no conflict between any circuits on this question.

5. Petitioner had no First Amendment claim. The First Amendment issues relating to billboard regulation have been decided in *Major Media, supra*, and a long line of other cases. Even had no statute of limitations been applicable the court could properly decide for the City on the merits by summary

judgment, according to the doctrine of *stare decisis.*

As Justice O'Conner noted in her opinion in *Yee*, the Court has the capacity to decide only a small fraction of the cases presented to it through the certiorari process and therefore, the Court must grant certiorari only in those cases that will allow the Court to resolve particularly important cases. This is not such a case and the Respondent respectfully urges the Court to deny the relief sought by this petitioner.

This the 24th day of April, 1992.

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